

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. THOMAS AND ST. JOHN

\*\*\*\*\*

ANDREW BABCOCK,  
Plaintiff,

v.

Case No. 3:21-cv-0048

THE TAP AND STILL ST. JOHN,  
HOOMAN PEDRAM, and  
CHRISTOPHER BATCHELOR,  
Defendants.

JURY TRIAL DEMANDED

**AGREED MOTION TO CONTINUE STATUS CONFERENCE**

COMES NOW Peter J. Lynch, Esq. of Fuller & Lynch Advocacy Group, PLLC, counsel for the Plaintiff Andrew Babcock, and moves this Honorable Court to continue the status conference scheduled for 10:00 am on January 12, 2023, and says:

1. Jeannine Lynch, the elderly mother of undersigned counsel, unfortunately passed away overnight in Massachusetts, and the undersigned is making plans to be with family.
2. A continuance of the status conference in the above-captioned action, set for January 12, 2023, is needed.
3. Counsel have conferred pursuant to LRCi 7.1(f). Opposing counsel Attorney Marinelli does not object to the requested continuance.

*Babcock v. The Tap and Still St. John et al.*

3:21-cv-0048

Motion to Continue Status Conference

Page 2 of 3

WHEREFORE Plaintiff's counsel Peter J. Lynch, Esq. respectfully requests that this Court grant his motion, and continue the January 12, 2023 status conference.

January 11, 2023

Respectfully submitted,

Fuller & Lynch Advocacy Group, PLLC

/s/ Peter J. Lynch

Peter J. Lynch, Esq.

VI Bar No. 1256

PO Box 303300

St. Thomas, VI 00803

(340) 201-3646

(888) 481-4960 fax

pete@flaglawvi.com

*Babcock v. The Tap and Still St. John et al.*

3:21-cv-0048

Motion to Continue Status Conference

Page 3 of 3

**Certificate of Service**

I hereby certify, under penalties of perjury, that on this 11<sup>th</sup> day of January, 2023, I served a copy of the foregoing on the below-listed counsel via the DC/ECF system:

Bolt Nagi, PC  
Adam N. Marinelli, Esq.  
Merchants Financial Center  
4608 Tutu Park Mall, Suite 202  
St. Thomas, VI 00802-1816  
Tel: 340.774.2944 Ext. 234  
Fax: 340.776.1639  
Counsel for Defendants  
amarinelli@vilaw.com

/s/ Peter J. Lynch